

July 30, 2019

1:00 pm

Notes from EPA & South Carolina DHEC FY2020 Inspection Planning Conference Call Meeting

EPA Region 4

César A. Zapata, Acting Branch Chief AEB

Todd Russo, Section Chief, AEB

Jason Dressler, Acting Section Chief, AEB

Kevin Taylor, Note Writer

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South Carolina Department of Health and Environmental Control (DHEC)

Robin Mack, Assistant Bureau Chief, Environmental Health Services

Elizabeth Basil, Assistant Bureau Chief, Environmental Health Services

Steve McCaslin, Chief, Division of Air Permitting

Marc McKenna, Asbestos Program Manager, Air Quality

Nelson Roberts, Manager, Air Initiatives & Mobile Sources

Bryon Woods, Air Toxics

Cindy Kilpatrick, Technical Management

The discussion led with introductions. César Zapata greeted the DHEC team and noted his role as acting branch chief for the AEB. Jason Dressler also noted his role as acting section chief and lead the discussion on the reorganization and some of the new areas, such as EPCRA, Asbestos, CERCLA, that are now with the AEB.

Jason Dressler described the conversion from the NEI to the NCI and outlined the three NCI areas of focus for the FY20-23 time period.

1. The first area was Creating Cleaner Air..., which was shortened to Reducing Excess Emissions. This area will focus on reducing VOC emissions in nonattainment and maintenance areas and reducing HAP emissions. AEB will continue to work in the areas that have been recently investigated. The first area is NESHAP 6B, which has been an area that AEB has worked in and has found problems, including some multistate issues. However, there are no NESHAP 6B inspections scheduled for FY20 at this time. AEB asked DHEC if there were any sources that they would be interested in us including for FY20 and they responded that they had no additions.

Another ongoing area of interest for the AEB is the MON wastewater requirements. This is an area that R4 has been investigating for several years and has found some problems. For FY20, AEB has targeted DAK Americas, located in Gaston. AEB asked if there were any issues or concerns for DAK in the past? DHEC stated that there was nothing they could think of at this time. When asked if there were any other MON sources that they wanted AEB to consider, DHEC responded that AEB had already targeted the main ones in the state so there were no other suggestions. DHEC did ask how these MON inspections were going to work with the work

going on with the RTR. AEB responded that OECA has a schedule with some deadlines but they are operating independent from what AEB is doing with the MON. Once AEB finds out the proposed changes, if any, that will be considered, but the facilities are supposed to be complying with what is out there now.

Jason Dressler stated that OECA is also considering including MACT Subpart DD for Off-Site Waste and Recovery under excess emissions. One possible facility in SC is Safety Kleen/Clean Harbors. The focus of the investigations under Subpart DD would be solvent recovery. DHEC stated that they did have issues with Safety Kleen years ago so they will have to go back and check on the history and see if they are still subject to Subpart DD. DHEC will check and get back with AEB on the status. When asked if there are any other sources subject to Subpart DD, DHEC stated that they will have to look.

2. The second area was Stopping After Market Defeat Devices. Jason Dressler stated that EPA will be inspecting in this area and will be using online searches to find the operations. The targets for this area are facilities that actively sell and/or install defeat devices. Many of these locations can be found by searching for “diesel performance” and “diesel tuning.” This program was administered by OECA, but it has now been transferred to the regions. DHEC stated that they would like notice of the inspections even though it is direct implementation. The DHEC contact for the inspections is Elizabeth Basil. She will also notify the district managers. Nelson Roberts, who deals with mobile sources and the Sierra Grant, would also like notice of the inspections. (Notice may also go to Michael Shroup in the Source Evaluation section).
3. Reducing Risk of Accidental Releases. This is primarily the RMP program. DHEC has delegation of the RMP program and it is administered out of Bryon Nichols’ Air Toxics section. They have 4 inspectors performing the RMP inspections throughout the state.
4. Other Regional AEB Activities
 - a. Mobile Source Imports – this area targets uncertified engines being brought into the country that are noncompliant with the EPA emission standards. AEB inspects suspected imports at the ports and with the help of Customs and Border Protection. AEB has developed a relationship with the Savannah and Jacksonville ports. Since then, AEB has had some information come in that a company maybe shifting its imports from Savannah to Charleston. AEB is currently monitoring the situation.
 - b. Asbestos – Asbestos is delegated to DHEC and is in Mark McKenna’s Asbestos section. He was advised that Pam Storm is now working on asbestos in the AEB.
 - c. EPCRA – this is a federally implemented program. However, DHEC would like to have notice of EPA’s EPCRA inspections, especially since it can overlap RMP
 - d. Shredders – AEB has an inspector from R5 on detail that has been conducting shredder inspections. The targets are shredders that have a production rate of > 110 tons per hour. The focus of the inspections is on PM and VOC emissions based on the SIP standards and under reporting of emissions using faulty emission estimates. CFC compliance is also being looked at. Some of these facilities are still old stack test

emission factors that are outdated. The results are still being evaluated. Right now, the focus is on compliance determinations for the inspections that were conducted and, if problems are found, this area will continue to be inspected.

- e. General Duty 112r – targeting ammonia refrigeration facilities that are reporting slightly below the 10,000 lb RMP threshold. This is a federally implemented program. There are no inspections planned for NC at this time but, if that changes, AEB will provide notice.
- f. Energy Extraction – this is now combined with the air toxics excess emissions. The focus for FY2020 is on NSPS OOOO and OOOOa. Based on the information that AEB has, there are not scheduled inspections for NC. However, AEB asked if DAQ knew of any facilities. DHEC stated that they are not sure and would have to check.
- g. Lead – this is not an NCI area, but EPA is looking at lead sources in each state. Asked if there were any sources that came to mind in SC, DHEC stated that Johnson Controls, located in Florence, is a lead smelter. It has ambient monitoring, but it was not required. The monitoring is a result of negotiations between the company and a community environmental group during the permitting process. The air monitor monitoring is alright, but the company has had problems with complying with Subpart X with its recordkeeping and with accidents.
- h. Open Discussion –
 - i. AEB offered assistance with the FLIR and other field equipment, if it is needed.
 - ii. Training – AEB will send the current FY19 training schedule from David Abbott. It was also mentioned that this would be a good time to make suggestions for the FY20 training schedule since it is currently being developed.

To Do List

1. Follow up with the listing of sites subject to NSPS OOOO and OOOOa.
2. Follow up with any sources subject to MACT Subpart DD and clarification on the status of Safety Kleen/Clean Harbors.
3. Send David Abbott's training schedule.